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*Attorneys for Lead Plaintiff*  
*Jeffrey M. Fiore and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

MICHAEL PARDI, *Individually and on Behalf*  
*of All Others Similarly Situated,*

Plaintiff,

v.

TRICIDA, INC. and GERRIT KLAERNER,

Defendants.

Case No. 4:21-cv-00076-HSG

**CLASS ACTION**

**JOINT STIPULATION AND  
[PROPOSED] ORDER SETTING  
SCHEDULE FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Hon. Haywood S. Gilliam, Jr.

Lead Plaintiff Jeffrey Fiore (“Plaintiff”) and Defendant Gerrit Klaerner (“Defendant,” and together with Plaintiff, the “Parties”), through their counsel and pursuant to the Court’s Order Granting Motion for Preliminary Approval of Class Action Settlement (Dkt. 220) (the “Order”), submit the following Joint Stipulation and [Proposed] Order Setting Schedule for Final Approval of Class Action Settlement (the “Joint Stipulation”).

WHEREAS, on March 3, 2025, Plaintiff filed his Notice of Motion, Unopposed Motion for Preliminary Approval of Settlement, and Memorandum of Points and Authorities in Support Thereof (Dkt. 211);

WHEREAS, on May 16, 2025, the Court entered the Order, granting preliminary approval to the Parties’ proposed settlement; and

WHEREAS, the Order directed the Parties to meet and confer and stipulate to a schedule of dates for the final fairness hearing and certain deadlines related to final approval of the settlement;

**NOW, THEREFORE,** the Parties having met and conferred, hereby stipulate and agree, subject to Court approval, to the following schedule for final approval:

<u>Event</u>	<u>Date</u>
Deadline for Settlement Administrator to mail notice to all putative Class Members <sup>1</sup>	July 3, 2025
Filing deadline for attorneys’ fees and costs motion	July 28, 2025
Filing deadline for incentive payment motion	July 28, 2025
Filing deadline for final approval motion	July 28, 2025
Deadline for Class Members to opt-out or object to settlement and/or application for attorneys’ fees and costs and incentive payment	September 11, 2025

<sup>1</sup> The Parties propose a longer notice deadline than originally contemplated to ensure sufficient time to obtain and process the transfer records from Tricida, Inc.’s former transfer agent. The Claims Administrator intends to begin the notice process to its Nominee Database—through which the vast majority of the class will obtain notice—before the deadline.

Filing deadline for final approval motion reply	October 9, 2025
Final fairness hearing and hearing on motions	October 16, 2025 at 2:00 p.m.

Dated: May 23, 2025

**BLOCK & LEVITON LLP**

/s/ Jeffrey C. Block

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*Counsel for Defendant Gerrit Klaerner*

**FILER'S ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that the above-named signatories have concurred in the filing of this document.

/s/ Jeffrey C. Block

Jeffrey C. Block

JOINT STIPULATION AND [PROPOSED] ORDER  
SETTING SCHEDULE FOR FINAL APPROVAL  
CASE NO. 4:21-cv-00076-HSG

\* \* \*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE